	7
	8
	9
	10
	11
	12
9169	13
æ ≥	14
Vegas	15
- Las	16
Las	17
	18
	19
	20
	21
	22
	23

24

25

26

27

28

- 1	
1	Meng Zhong, Esq.
	Nevada Bar No. 12145
2	Dibora Berhanu, Esq.
	Nevada Bar No. 16046
3	LEWIS ROCA ROTHGERBER CHRISTIE LLP
	3993 Howard Hughes Pkwy., Ste. 600
4	Las Vegas, Nevada 89169
	Tele: 702-949-8200
5	Email: mzhong@lewisroca.com
	Email: dberhanu@lewisroca.com
6	Differit documents (c) for with for different
	In conjunction with Legal Aid Center of Southern
7	Nevada Federal Pro Bono Program

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

JASON S. BROWN,	Case No. 3:21-cv-00500-MMD-CSD
Plaintiff,	
	STIPULATION AND ORDER TO
v.	EXTEND DEADLINE FOR
	PLAINTIFF TO RESPOND TO
DR. ADAMSON, et al.,	DEFENDANTS' MOTION FOR
	SUMMARY JUDGMENT BY 30 DAYS
Defendants.	
	(SECOND REOUEST)

Under Federal Rules of Civil Procedure 6 and Local Rule IA 6-1, Plaintiff Jason S. Brown ("<u>Plaintiff</u>") and Defendants Coach Fraley, Dr. Dana Marks and Dr. Kim Adamson (collectively "<u>Defendants</u>"), by and through their respective undersigned counsel, stipulate and agree as follows:

- 1. Defendants filed their Motion for Summary Judgment on August 30, 2024.
- 2. On September 10, 2024, the parties agreed to extend the deadline for Plaintiff to respond to Defendants' Motion for Summary Judgment by thirty (30) days from the September 20, 2024 deadline to October 21, 2024.
- 3. The parties have agreed to extend the deadline for Plaintiff to respond to Defendants' Motion for Summary Judgment by another (30) days from the current October 21, 2024 deadline to November 20, 2024.
- 4. This is the second stipulation of the parties to extend the deadline for Plaintiff to respond to Defendants' Motion for Summary Judgment.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

5. This stipulation is made in g	good faith by the parties. Plaintiff's counsel has	
experienced difficulty scheduling a private call with the Plaintiff in light of a new system		
implemented by the Nevada Department of Corrections for inmate calls. Scheduling the		
private call with the Plaintiff is taking longer than usual and Plaintiff's counsel requires		
additional time to work through that process and obtain the necessary permissions/approvals		
from their client to be able to file a response.		
IT IS SO STIPULATED.		
Dated this 17 th day of October 2024.	Dated this 17 th day of October 2024.	
Attorney General State of Nevada, Public Safety Division	LEWIS ROCA ROTHGERBER CHRISTIE LLP	
By: /s/ Leo T. Hendges	By: /s/ Meng Zhong	

Leo T. Hendges, Senior Deputy Attorney General State of Nevada 1 State of Nevada Way, Ste. 100 Las Vegas, Nevada 89119 Tel: (702) 486-3795 E-mail: <u>lhendges@ag.nv.gov</u>

Dibora L. Berhanu 3993 Howard Hughes Pkwy., #600 Las Vegas, NV 89169 E-mail: mzhong@lewisroca.com E-mail: dberhanu@lewisroca.com

In conjunction with Legal Aid Center of Southern Nevada Federal Pro Bono Program

Attorneys for Defendants Coach Fraley, Dr. Dana Marks and Dr. Kim Adamson

IT IS SO ORDERED.

U.S. Magistrate Judg

Dated: October 18, 2024